



## PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA

(Article 13 EU Regulation No. 679 of 27 April 2016 on the protection of personal data "GDPR")

Pursuant to the requirements imposed by the General Data Protection Regulation, the Data Controller provides the data subject with the following information in relation to the processing of personal data carried out.

### DATA PROCESSOR

<b>Company name</b>	Urbani Tartufi s.r.l.	<b>VAT number / Tax Code</b>	IT02554550547 / IT02554550547
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### CONTACTS FOR THE EXERCISE OF RIGHTS

Requests to exercise rights under the GDPR or any revocation of consent may be addressed to the Data Controller at the following contact points:

<b>Address</b>	SR 209 Valnerina Km 31+300 - 06040, Sant'Anatolia di Narco (PG) - Italy	<b>Contact points</b>	0743 613171, gpd@urbanitartufi.it, urbanitartufi@pec.it
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### DATA SUBJECT CATEGORIES

<b>Customer</b>
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### PROCESSING

#### Order Processing

	Purposes	Legal basis
<b>Purposes not requiring consent</b>	Processing of active orders, generation of invoices and transport documents	Execution of a contract and/or pre-contractual measures, legal obligation, compliance with accounting, administrative and tax regulations.
<b>Types of mandatory data</b>	Master data, Confidentiality agreements, Invoicing and payment data  The provision of data is mandatory for everything regarding the execution of contractual, administrative, and legal obligations regarding the supply relationship. Any refusal to provide the data, or revocation of consent, makes it impossible to execute the contract.	
<b>Recipient Categories</b>	For legal obligations or exclusively for functional purposes within the scope of the execution of the contract, the collected data may be disclosed to the following categories of recipients:  Accounting and labour consulting firms	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.

Sales cycle		
<b>Purposes not requiring consent</b>	<b>Purposes</b>	<b>Legal basis</b>
	Processing of the order with generation of accounting documents	Performance of a contract and/or pre-contractual measures
<b>Types of mandatory data</b>	Customer master data, invoicing and payment data The provision of data is mandatory for everything regarding the execution of contractual, administrative, and legal obligations regarding the supply relationship. Any refusal to provide the data, or revocation of consent, makes it impossible to execute the contract.	
<b>Recipient Categories</b>	For legal obligations or exclusively for functional purposes within the scope of the execution of the contract, the collected data may be disclosed to the following categories of recipients: Agents	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.

<b>Admin - Treasury</b>		
<b>Purposes not requiring consent</b>	<b>Purposes</b>	<b>Legal basis</b>
	Collection management	Performance of a contract and/or pre-contractual measures
	Financial analyses	Performance of a contract and/or pre-contractual measures
	Supplier payments	Performance of a contract and/or pre-contractual measures
<b>Types of mandatory data</b>	<p>Customer master data, invoicing and payment data</p> <p>The provision of data is mandatory for everything regarding the execution of contractual, administrative, and legal obligations regarding the supply relationship. Any refusal to provide the data, or revocation of consent, makes it impossible to execute the contract.</p>	
<b>Types of optional data</b>	<p>Supplier master data</p> <p>The conferment of data is optional. However, refusal to provide the data or partial or complete opposition to their processing could nevertheless make it impossible for the company to establish the contractual relationship.</p>	
<b>Recipient Categories</b>	<p>For legal obligations or exclusively for functional purposes within the scope of the execution of the contract, the collected data may be disclosed to the following categories of recipients:</p> <p>Consulting firm</p>	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.

<b>Admin - Administration</b>		
<b>Purposes not requiring consent</b>	<b>Purposes</b>	<b>Legal basis</b>
	Administrative, accounting and fiscal management of the company, for operation and fulfilment of tax obligations	Accounting and administrative obligations
<b>Types of mandatory data</b>	<p>Customers' master data, Accounting documents Mandatory</p> <p>The provision of data is mandatory for everything regarding the execution of contractual, administrative, and legal obligations regarding the supply relationship. Any refusal to provide the data, or revocation of consent, makes it impossible to execute the contract.</p>	
<b>Types of optional data</b>	<p>Shipping documents, Invoices, Tax Receipts, Supplier Records, Certificates of Economic and Financial Capacity, Certificates of Technical and Professional Capacity, Certificates of Income from Employment, Self-Employment or Other Income, Single Certificate for the Company, Certificates of General Requirements, Payment Data, Solvency</p> <p>The conferment of data is optional. However, refusal to provide the data or partial or complete opposition to their processing could nevertheless make it impossible for the company to establish the contractual relationship.</p>	
<b>Recipient Categories</b>	<p>For legal obligations or exclusively for functional purposes within the scope of the execution of the contract, the collected data may be disclosed to the following categories of recipients:</p> <p>Internal Revenue Service, Social Security Institutions, Accounting and Labour Consulting firms</p>	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Tax data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.

<b>Admin - Credit Management</b>		
<b>Purposes not requiring consent</b>	<b>Purposes</b>	<b>Legal basis</b>
	Payments and collection of invoices	Execution of a contract and/or pre-contractual measures, fulfilment of pre-contractual, contractual and tax obligations arising from existing relations with the data subject
	Debt Collections	Execution of a contract and/or pre-contractual measures, fulfilment of pre-contractual, contractual and tax obligations arising from existing relations with the Data Subject; exercise the Data Controller's rights in case of insolvency of the counterparty
<b>Types of mandatory data</b>	Payment Data, Master Data The provision of data is mandatory for everything regarding the execution of contractual, administrative, and legal obligations regarding the supply relationship. Any refusal to provide the data, or revocation of consent, makes it impossible to execute the contract.	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers. Only the contact data provided by the customer will be retained until the right of revocation is exercised, so that Urbani Tartufi Srl can subsequently offer further products similar to those already provided.

<b>Admin - AUDITING OF FINANCIAL STATEMENTS</b>		
<b>Purposes not requiring consent</b>	<b>Purposes</b>	<b>Legal basis</b>
	Management duties and obligations	Legal obligations
<b>Types of optional data</b>	Financial statements, Company Registers, Accounting Records The conferment of data is optional. However, refusal to provide the data or partial or complete opposition to their processing could nevertheless make it impossible for the company to establish the contractual relationship.	
<b>Retention periods per category of personal data</b>	<b>Category</b>	<b>Retention period</b>
	<b>Master data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers.
	<b>Economic data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers.
	<b>Tax data</b>	Data are kept for the time necessary to pursue the purposes for which they are processed, in application of the provisions of the reference legislation, except for the longer period necessary to ensure the possible protection of the company with regard to liability arising from the contractual relationship, to comply with legal obligations, due to the nature of the data or document, or for reasons of public interest or the exercise of public powers.

<b>RIGHTS OF THE DATA SUBJECT</b> (Articles 15 to 22 and Article 13 of the GDPR)	
<b>Right of access</b>	According to Article 15 of the GDPR, the data subject has the right to request access to their personal data from the controller.
<b>Right to rectification</b>	According to Article 16 of the GDPR, the data subject has the right to request rectification of their personal data from the controller.
<b>Right to erasure</b>	According to Article 17 of the GDPR, the data subject has the right to request erasure of their personal data from the controller.
<b>Right to restriction of processing</b>	According to Article 18 of the GDPR, the data subject has the right to ask the controller to restrict the processing of his/her data.
<b>Right to object</b>	According to Article 21 of the GDPR, the data subject has the right to object to the processing of his/her data.
<b>Right to data portability</b>	According to Article 20 of the GDPR, the data subject has the right to portability of his/her data.
<b>How to exercise the rights</b>	To assert his/her rights, the data subject may contact the Data Controller specifying the subject of his/her request, the right he/she intends to exercise and attaching a photocopy of an identity document attesting to the legitimacy of the request, using the contact details given in this document.
<b>Additional notes</b>	The data subject may also lodge a complaint with a supervisory authority (e.g. the Data Protection Authority).
<b>AUTOMATED PROCESS</b>	
<b>Is there an automated process?</b>	Processing is not based on an automated decision-making process.